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March 3, 2025

**Via CM/ECF**

Hon. Andre Espinosa, U.S.M.J.  
United States District Court, District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street, Courtroom PO 08  
Newark, New Jersey 07101

**Re: New Wallington Home, LLC v. Borough of Wallington, et al**  
**Civil Case No. : 20-08178 (CCC) (AME)**

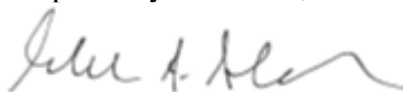
Dear Judge Espinosa:

This office represents Defendant Borough of Wallington, *et al.* (hereinafter “Defendants”) in connection with the above referenced matter, which is scheduled for a settlement conference on March 6, 2025. On Friday, February 28, 2025, Plaintiff served Defendants with a preliminary damages report and settlement proposal. In light of the substantial nature of Plaintiff’s damages, Defendants respectfully request that the settlement conference be postponed. As Your Honor is aware, Defendant is a public entity and Mayor and council will need time to discuss Plaintiff’s new proposal and damages report. Plaintiff’s counsel has consented to an adjournment of the settlement conference.

Kindly advise if the Court will grant this adjournment request and the parties can submit proposed dates for the settlement conference.

Thank you for Your Honor’s attention to this matter.

Respectfully submitted,



**GERALD A. SHEPARD**

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cc: James DiGiulio, Esq. – *Via CM/ECF*